



Certain Merchant Defendants also sell materials used to manufacture or market Counterfeit Products. For example, Merchant Defendant Guangzhou Feiteng Junye Gifts Manufacturing Co., Ltd. manufactures large volumes of metal tags intended to be affixed to counterfeit items and offers them wholesale on Alibaba.com in orders of 500 (the minimum number of tags per order) and up to 500,000 per month. Holmes Decl. ¶ 18, Ex. 4; *see also* Claquin Decl. ¶ 45. These tags are purposefully designed to mislead consumers as to the origin of each item they are affixed to. Shown below (on the left) are two “custom metal logo plate for handbags” and (on the right) a “handbag metal tag,” each engraved with copies of Gucci’s federally registered trademarks. *See* Am. Compl., at Ex. 1 (U.S. Reg. Nos. 876,292 and 3,061,918).



Each of the Counterfeit Products sold by Merchant Defendants on Alibaba.com is manufactured and designed to exploit Plaintiffs' brands and purposefully mislead consumers into associating it with Plaintiffs' Products.

B. Merchant Defendants Selling Counterfeit Products Through Taobao.com

Certain Merchant Defendants sell Counterfeit Products bearing Plaintiffs' Marks to consumers in the United States through their storefronts on Taobao.com, a Chinese-language website that advertises itself as accessible to consumers in the United States. Notably, several Merchant Defendants continue to offer Counterfeit Products even after Plaintiffs notified Taobao.com that these merchants were selling Counterfeit Products. For example, Merchant Defendant Kou Kou Dai (Buckle the Pocket) continues to offer Counterfeit Products for sale on Taobao.com, even after Plaintiffs' representatives notified Taobao.com on at least two separate occasions—beginning in December 2014—of the merchant's illegal activity. Set forth below is a picture of a Counterfeit Product purchased by Plaintiffs' investigator on June 6, 2015, from Kou Kou Dai (Buckle the Pocket) Taobao.com storefront for \$14.35 (notably, the authentic version retails for \$1640). Holmes Decl. ¶ 25, at Ex. 8; Claquin Decl. ¶ 49. The Counterfeit Product depicted below bears exact copies of Gucci's federally registered repeating "GG" design trademark and green-red-green stripe trademark. *See* Am Compl., at Ex. 1 (U.S. Reg. Nos. 4,229,081 and 1,122,780).